

KREKELER LAW, S.C.

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April 16, 2025

The Honorable Catherine J. Furay
U.S. Bankruptcy Court
Western District of Wisconsin
120 N. Henry Street, Room 340
Madison, Wisconsin 53705-2559

Re: *In re Todd M. Lekan*
Case No. 23-11768-cjf

Dear Judge Furay:

On February 24, 2025, Todd M. Lekan (the "Debtor"), filed a proposed Amended Disclosure Statement [Dkt. #97]. On March 14, 2025, the Court scheduled an in-person hearing on the Amended Disclosure Statement for April 18, 2025, at 10:30 A.M ("Disclosure Hearing") [Dkt. #100].

The Debtor respectfully requests the Court convert the Disclosure Hearing to a telephonic status conference. This request is made in light of two recent developments that materially affect the viability of the Amended Disclosure Statement:

1. **Loss of Employment:** The Debtor has recently lost his job, which was one of two sources of income supporting the Amended Chapter 11 Plan [Dkt. #98]. Without this income, the assumptions and projections contained in the Amended Disclosure Statement are no longer accurate, and the feasibility of the Amended Chapter 11 Plan is compromised.
2. **Objection by United States Trustee:** The United States Trustee has timely filed an objection, raising concerns that will need to be addressed before approval can be reasonably considered.

The Debtor believes it would be more appropriate and efficient to treat the Disclosure Hearing as a status conference, during which the parties and the Court can discuss the status of this case and set a deadline for and a hearing on a revised disclosure statement.

Thank you for your consideration.

Sincerely,

KREKELER LAW, S.C.



Noe J. Rincon
NJR/cfw